

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

UNITED STATES OF AMERICA,)
)
Plaintiff,)
) Civil Action No.
v.) 1:21-cv-03586-JPB
)
)
CADENCE BANK, N.A.,)
)
Defendant.)
)

**UNOPPOSED MOTION AND MEMORANDUM IN SUPPORT TO
TERMINATE CONSENT ORDER AND DISMISS WITH PREJUDICE**

Plaintiff the United States of America (“United States”), by and through undersigned counsel, files this unopposed motion to provide the Court with a status update and to respectfully request termination of the Consent Order and dismissal of this case with prejudice.

The Court entered a Consent Order in this case on October 31, 2021 (ECF 4) (“Consent Order”). The Consent Order states that its requirements will remain in effect for five (5) years or longer if Cadence Bank (“Cadence”) has not invested all money required by the Consent Order. (*Id.* ¶¶ 45-46). The Consent Order also states that other modifications may be made upon approval of the Court, by motion by any Party, and that the Parties will work cooperatively to propose modifications if there

are changes in material factual circumstances. (*Id.* ¶ 47).

In support of this motion, Plaintiff advises the Court that Cadence has demonstrated a commitment to remediation, and:

1. Cadence has fully disbursed the loan subsidy fund (\$4,170,000) as required under the terms of the Consent Order (*see id.* ¶ 25); and
2. Cadence is substantially in compliance with the other monetary and injunctive terms of the Consent Order.

We have conferred with counsel for Cadence, and the entity does not oppose the motion.

WHEREFORE, for these reasons, Plaintiff respectfully requests that the Court enter the attached Proposed Order terminating the Consent Order and dismissing this case with prejudice.

Respectfully submitted this 27th day of May 2025.

For the United States of America:

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CERTIFICATE OF CONSULTATION

I certify that on May 27, 2025, I consulted with Defendant's counsel regarding this motion and Defendant's counsel does not oppose the relief requested herein.

/s/ Marta Campos
Marta Campos
Trial Attorney
Housing & Civil Enforcement Section

CERTIFICATE OF SERVICE

I certify that on May 27, 2025 I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filings to all counsel of record.

/s/ Aileen Bell Hughes

Aileen Bell Hughes
Assistant United States Attorney
United States Attorney's Office
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